

SWORN STATEMENT OF MARTHA FARABEE FLANAGAN

I, Martha Farabee Flanagan give this sworn declaration of my own free will and without outside influences.

I served as Cheekwood's second Development Director in the 1990s and during my tenure, I:

- Started The Cheekwood Society and Dinner
- Chaired the first Annual Campaign Drive
- Participated in the "Campaign for Cheekwood" which developed the new gardens and sculpture trail
- Coordinated fundraising among Cheekwood Development Office, Antique and Garden Show and Swan Ball

Additionally, during this time,

- Cheekwood was fully aware of a volunteer organization known as the Swan Ball Volunteer Committee (the "Committee")
- The Committee was recognized by Cheekwood as an organization separate and apart from Cheekwood
- The Committee annually organized and held the SWAN BALL gala without any input or control by Cheekwood
- The Swan Ball Former Chairmen selected and invited the Swan Ball Chairmen each year – Cheekwood had no involvement or input into this process
- The Committee was totally in charge of the gala and it controlled the nature and quality of the event that it produced under the name SWAN BALL;
- Cheekwood was the beneficiary of the activities of the Committee and received a donation every year in an amount determined by the Committee and without any control by Cheekwood
- Cheekwood had no input or control over any of the activities and/or operations of the SWAN BALL gala, including, but not limited to the following:
 - i. Selection of the theme of the gala
 - ii. Selection of the entertainment for the gala
 - iii. Selection of the caterer for the gala
 - iv. Selection of the menu for the gala
 - v. Selection of the design of the invitation for the gala
 - vi. Selection of the flowers for the gala
 - vii. Determination of those individuals who would receive an invitation to the gala
 - viii. Contracts and vendors engaged to assist with the production of the gala

Cheekwood was the beneficiary of the labors of the Committee and Cheekwood did not provide staffing to help the gala happen, either from a fundraising or administrative perspective;

Cheekwood was fortunate to have the financial support of the Committee and had a very collaborative relationship with the Swan Ball Volunteers.

I declare under penalty of perjury that the foregoing is true and correct.

Martha Flanagan (Signature)

Martha Flanagan (Print Name)

9/5/24 (DATE)